

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**SUMMER NICHOLE MCCROSKEY,
and
LAWRENCE AQUILLA COLBY, IV,

Defendants.**

CRIMINAL NO. RDB-22-220

(Conspiracy to Commit Sexual Exploitation of a Child, 18 U.S.C. § 2251(e); Sexual Exploitation of a Child, 18 U.S.C. § 2251(a); Distribution of Visual Depictions of Minors Engaged in Sexually Explicit Conduct, 18 U.S.C. § 2252(a)(2) & 2256; Receipt of Child Pornography, 18 U.S.C. § 2252(a)(2); Possession of Child Pornography, 18 U.S.C. § 2252A(a)(5)(B); Forfeiture, 18 U.S.C. § 2253, 21 U.S.C. § 853, 28 U.S.C. § 2461)

INDICTMENT

COUNT ONE

(Conspiracy to Commit Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland charges that:

Introduction

At all times material to this Indictment:

1. **SUMMER NICHOLE MCCROSKEY (“MCCROSKEY”)** was born in 1997, and resided in Cecil County, Maryland.
2. **LAWRENCE AQUILLA COLBY, IV (“COLBY”)** was born in 1988, and resided in Cecil County, Maryland.
3. **MCCROSKEY** and **COLBY** were in a romantic relationship beginning in approximately 2017, and married in 2020.
4. Beginning no later than February 2020, **MCCROSKEY** and **COLBY** lived in the same houses in Cecil County, Maryland.
5. Jane Doe, a prepubescent female, was born in 2019, and was 2 years old or younger at all relevant times.

6. From at least October 2021 through about December 2021, **MCCROSKEY** and **COLBY** communicated on an internet-based social media platform regarding their past and future abuse of Jane Doe.

7. Beginning no later than January 2020 through in or about October 2021, **MCCROSKEY** and **COLBY** sexually exploited Jane Doe, and produced video and image files of the exploitation.

8. On or before January 21, 2020, **MCCROSKEY** produced images of Jane Doe's genitals, when Jane Doe was approximately 3 months old.

9. On or before February 27, 2020, **MCCROSKEY** and **COLBY** sexually abused Jane Doe, then approximately 4 months old, and recorded the abuse.

10. On or before March 10, 2020, **COLBY** sexually abused Jane Doe, then approximately 5 months old, and recorded the abuse.

11. On or before March 13, 2020, **MCCROSKEY** sexually abused Jane Doe, then approximately 5 months old, and recorded the abuse.

12. On or before March 17, 2020, **COLBY** sexually abused Jane Doe, then approximately 5 months old, and recorded the abuse.

13. On or before March 20, 2020, **MCCROSKEY** sexually abused Jane Doe, then approximately 5 months old, and recorded the abuse.

14. On or before October 13, 2021, **MCCROSKEY** sexually abused Jane Doe, then approximately 2 years old, and recorded the abuse.

15. On or about October 20, 2021, **MCCROSKEY** and **COLBY** sexually abused Jane Doe, then approximately 2 years old, and recorded the abuse.

16. On or about October 25, 2021, **MCCROSKEY** and **COLBY** sexually abused Jane Doe, then approximately 2 years old, and recorded the abuse.

17. From on or about February 2020 through October 2021, **MCCROSKEY** distributed files depicting the abuse of Jane Doe to **COLBY** and others using internet-based social media platforms.

Manner and Means of the Conspiracy

18. It was part of the conspiracy that **MCCROSKEY** and **COLBY** sexually abused Jane Doe.

19. It was further part of the conspiracy that **MCCROSKEY** and **COLBY** recorded their abuse of Jane Doe and saved the files to their digital devices.

The Charge

20. From no later than January 2020 through in or about October 2021, the defendants,

**SUMMER NICHOLE MCCROSKEY, and
LAWRENCE AQUILLA COLBY, IV,**

conspired and agreed with one another to employ, use, persuade, induce, entice and coerce any minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, and such visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2251(a).

18 U.S.C. § 2251(e)

18 U.S.C. § 3559(e) (1)

COUNT TWO
(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or before January 21, 2020, in the District of Maryland, the defendant,

SUMMER NICHOLE MCCROSKEY,

did knowingly employ, use, persuade, induce, entice and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, video and image files depicting Jane Doe, naked, with her genitals exposed, said files having been stored on a Motorola XT1952DL, IMEI 359538091612313.

18 U.S.C. § 2251(a)
18 U.S.C. § 2

COUNT THREE

(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or before February 27, 2020, in the District of Maryland, the defendant,

**SUMMER NICHOLE MCCROSKEY, and
LAWRENCE AQUILLA COLBY, IV,**

did knowingly employ, use, persuade, induce, entice and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, video and image files depicting an adult penis touching and penetrating the mouth of Jane Doe, said files having been stored on a Motorola XT1952DL, IMEI 359538091612313 and a Motorola XT1955DL, IMEI 359529091103155.

18 U.S.C. § 2251(a)

18 U.S.C. § 2

COUNT FOUR

(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or before March 10, 2020, in the District of Maryland, the defendant,

LAWRENCE AQUILLA COLBY, IV,

did knowingly employ, use, persuade, induce, entice and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, image files depicting a hand touching the genitals of Jane Doe, said files having been stored on a Motorola XT1952DL, IMEI 359538091612313.

18 U.S.C. § 2251(a)
18 U.S.C. § 2

COUNT FIVE

(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or before March 13, 2020, in the District of Maryland, the defendant,

SUMMER NICHOLE MCCROSKEY,

did knowingly employ, use, persuade, induce, entice and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, video and image files depicting a hand touching the exposed genitals of Jane Doe, said files having been stored on a Motorola XT1952DL, IMEI 359538091612313, and a Motorola XT1955DL, IMEI 359529091103155.

18 U.S.C. § 2251(a)

18 U.S.C. § 2

COUNT SIX

(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or before March 17, 2020, in the District of Maryland, the defendant,

LAWRENCE AQUILLA COLBY, IV,

did knowingly employ, use, persuade, induce, entice and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, image files depicting an adult penis touching and penetrating the mouth of Jane Doe, said files having been stored on a Motorola XT1952DL, IMEI 359538091612313.

18 U.S.C. § 2251(a)

18 U.S.C. § 2

COUNT SEVEN

(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or before March 20, 2020, in the District of Maryland, the defendant,

SUMMER NICHOLE MCCROSKEY,

did knowingly employ, use, persuade, induce, entice and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, video and image files depicting an adult female's mouth and tongue on Jane Doe's genitals, and an adult female's finger penetrating Jane Doe's anus, said files having been stored on a Motorola XT1952DL, IMEI 359538091612313, and a Motorola XT1955DL, IMEI 359529091103155.

18 U.S.C. § 2251(a)

18 U.S.C. § 2

COUNT EIGHT

(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or before October 13, 2021, in the District of Maryland, the defendant,

SUMMER NICHOLE MCCROSKEY,

did knowingly employ, use, persuade, induce, entice and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, a video file depicting a hand touching the exposed genitals of Jane Doe, said file having been stored on a Motorola XT1955DL, IMEI 359529091103155.

18 U.S.C. § 2251(a)

18 U.S.C. § 2

COUNT NINE

(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or about October 20, 2021, in the District of Maryland, the defendant,

**SUMMER NICHOLE MCCROSKEY, and
LAWRENCE AQUILLA COLBY, IV,**

did knowingly employ, use, persuade, induce, entice and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, video and image files depicting an adult penis penetrating Jane Doe's anus while her arms and legs are bound, said files having been stored on a Motorola XT1952DL, IMEI 359538091612313, and a Motorola XT1955DL, IMEI 359529091103155, and two (2) of the video files and one (1) of the image files having been produced using a Motorola XT1952DL.

18 U.S.C. § 2251(a)

18 U.S.C. § 2

COUNT TEN
(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or about October 25, 2021, in the District of Maryland, the defendant,

**SUMMER NICHOLE MCCROSKEY, and
LAWRENCE AQUILLA COLBY, IV,**

did knowingly employ, use, persuade, induce, entice and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, video and image files depicting an adult penis penetrating Jane Doe's anus and an object penetrating Jane's Doe's genitals, while Jane Doe is gagged and her arms and legs are bound by and adult male, said files having been produced and stored on a Motorola XT1952DL, IMEI 359538091612313.

18 U.S.C. § 2251(a)

18 U.S.C. § 2

COUNT ELEVEN

(Distribution of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or about February 27, 2020, in the District of Maryland, the defendant,

SUMMER NICHOLE MCCROSKEY,

did knowingly distribute any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so mailed, shipped and transported, by any means including by computer, the production of which involved the use of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such depiction being of such conduct, that is, **MCCROSKEY** distributed a video file depicting an adult penis penetrating Jane Doe's mouth.

18 U.S.C. § 2252(a)(2) & 2256

18 U.S.C. § 2

COUNT TWELVE

(Distribution of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or about March 20, 2020, in the District of Maryland, the defendant,

SUMMER NICHOLE MCCROSKEY,

did knowingly distribute any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so mailed, shipped and transported, by any means including by computer, the production of which involved the use of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such depiction being of such conduct, that is, **MCCROSKEY** distributed a video file depicting an adult female placing her mouth and tongue on Jane Doe's exposed genitals and an adult female using her finger to touch Jane Doe's exposed anus.

18 U.S.C. § 2252(a)(2) & 2256

18 U.S.C. § 2

COUNT THIRTEEN

(Distribution of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or about October 13, 2021, in the District of Maryland, the defendant,

SUMMER NICHOLE MCCROSKEY,

did knowingly distribute any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so mailed, shipped and transported, by any means including by computer, the production of which involved the use of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such depiction being of such conduct, that is, **MCCROSKEY** distributed a video file titled “1_5129809350935708081.mp4”, depicting a hand touching Jane Doe’s exposed genitals.

18 U.S.C. § 2252(a)(2) & 2256

18 U.S.C. § 2

COUNT FOURTEEN
(Receipt of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or about October 13, 2021, in the District of Maryland, the defendant,

LAWRENCE AQUILLA COLBY, IV,

did knowingly receive any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so mailed, shipped and transported, by any means including by computer, and knowingly reproduced any visual depiction for distribution using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and through the mail, the production of which involved the use of a minor engaged in sexually explicit conduct and such depiction being of such conduct, that is, the **COLBY** received a video file titled “1_5129809350935708081.mp4”, depicting a hand touching Jane Doe’s exposed genitals.

18 U.S.C. § 2252(a)(2) & 2256

18 U.S.C. § 2

COUNT FIFTEEN

(Distribution of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or about October 25, 2021, in the District of Maryland, the defendant,

SUMMER NICHOLE MCCROSKEY,

did knowingly distribute any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so mailed, shipped and transported, by any means including by computer, the production of which involved the use of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such depiction being of such conduct, that is, **MCCROSKEY** distributed one (1) image file and two (2) video files as follows:

File Name	Details
-5165969668899449177_121.jpg	Image file depicting an adult penis penetrating Jane Doe's anus while Jane Doe's arms are bound.
1_5165969668443210161.mp4	Video file depicting an adult penis penetrating Jane Doe's anus while Jane Doe's arms and legs are bound.
1_5165969668443210162.mp4	Video file depicting an adult penis penetrating Jane Doe's anus, while Jane Doe's arms and legs are bound.

18 U.S.C. § 2252(a)(2) & 2256

18 U.S.C. § 2

COUNT SIXTEEN
(Receipt of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or about October 25, 2021, in the District of Maryland, the defendant,

LAWRENCE AQUILLA COLBY, IV,

did knowingly receive any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so mailed, shipped and transported, by any means including by computer, and knowingly reproduced any visual depiction for distribution using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and through the mail, the production of which involved the use of a minor engaged in sexually explicit conduct and such depiction being of such conduct, that is, **COLBY** received one (1) image file and two (2) video files as follows:

File Name	Details
-5165969668899449177_121.jpg	Image file depicting an adult penis penetrating Jane Doe's anus while Jane Doe's arms are bound.
1_5165969668443210161.mp4	Video file depicting an adult penis penetrating Jane Doe's anus while Jane Doe's arms and legs are bound.
1_5165969668443210162.mp4	Video file depicting an adult penis penetrating Jane Doe's anus, while Jane Doe's arms and legs are bound.

18 U.S.C. § 2252(a)(2) & 2256
18 U.S.C. § 2

COUNT SEVENTEEN
(Distribution of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or about December 23, 2021, in the District of Maryland, the defendant,

SUMMER NICHOLE MCCROSKEY,

did knowingly distribute any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so mailed, shipped and transported, by any means including by computer, the production of which involved the use of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such depiction being of such conduct, that is, **MCCROSKEY** distributed three (3) video files as follows:

File Name	Details
1_5050877236538769992.mp4	Video file depicting a penis penetrating the genitals of a prepubescent minor.
1_5050877236538769990.mp4	Video file depicting an adult penis penetrating what appears to be the anus of a prepubescent minor.
1_5050877236538769988.mp4	Video file depicting an adult penis penetrating the mouth of a prepubescent minor.

18 U.S.C. § 2252(a)(2) & 2256

18 U.S.C. § 2

COUNT EIGHTEEN
(Receipt of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or about December 23, 2021, in the District of Maryland, the defendant,

LAWRENCE AQUILLA COLBY, IV,

did knowingly receive any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so mailed, shipped and transported, by any means including by computer, and knowingly reproduced any visual depiction for distribution using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and through the mail, the production of which involved the use of a minor engaged in sexually explicit conduct and such depiction being of such conduct, that is, **COLBY** received three (3) video files as follows:

File Name	Details
1_5050877236538769992.mp4	Video file depicting an adult penis penetrating the genitals of a prepubescent minor.
1_5050877236538769990.mp4	Video file depicting an adult penis penetrating the anus of a prepubescent minor.
1_5050877236538769988.mp4	Video file depicting an adult penis penetrating the mouth of a prepubescent minor.

18 U.S.C. § 2252(a)(2) & 2256
18 U.S.C. § 2

COUNT NINETEEN
(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here
2. On or about February 11, 2022, in the District of Maryland, the defendant,

SUMMER NICHOLE MCCROSKEY,

did knowingly possess and knowingly access with intent to view any book, magazine, periodical, film, videotape, computer disk, and any other material that contained an image of child pornography, as defined in Title 18 United States Code, Section 2256(8)(A), that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant possessed an iPhone XR, Serial Number FK1XM3ZZKXL6, which contained one or more visual depictions of prepubescent minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B) & 2256
18 U.S.C. § 2

COUNT TWENTY
(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here
2. On or about February 11, 2022, in the District of Maryland, the defendant,

SUMMER NICHOLE MCCROSKEY,

did knowingly possess and knowingly access with intent to view any book, magazine, periodical, film, videotape, computer disk, and any other material that contained an image of child pornography, as defined in Title 18 United States Code, Section 2256(8)(A), that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant possessed a Motorola XT1952DL, IMEI 359538091612313, which contained one or more visual depictions of prepubescent minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B) & 2256
18 U.S.C. § 2

COUNT TWENTY-ONE
(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here
2. On or about February 11, 2022, in the District of Maryland, the defendant,

SUMMER NICHOLE MCCROSKEY,

did knowingly possess and knowingly access with intent to view any book, magazine, periodical, film, videotape, computer disk, and any other material that contained an image of child pornography, as defined in Title 18 United States Code, Section 2256(8)(A), that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant possessed a Samsung Galaxy J3 Orbit, IMEI 352069106335325, which contained one or more visual depictions of prepubescent minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B) & 2256
18 U.S.C. § 2

COUNT TWENTY-TWO
(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Nineteen of Count One are incorporated here
2. On or about February 11, 2022, in the District of Maryland, the defendant,

LAWRENCE AQUILLA COLBY, IV,

did knowingly possess and knowingly access with intent to view any book, magazine, periodical, film, videotape, computer disk, and any other material that contained an image of child pornography, as defined in Title 18 United States Code, Section 2256(8)(A), that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant possessed a Motorola XT1955DL, IMEI 359529091103155, which contained one or more visual depictions of prepubescent minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B) & 2256
18 U.S.C. § 2

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. of Crim. P. 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 2253, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c) as a result of a defendant's conviction under any of the offenses set forth in Counts One through Twenty-Two of this Indictment.

3. Upon conviction of any of the offenses in Counts One through Twenty-Two of this Indictment, the defendant,

**SUMMER NICHOLE MCCROSKEY, and
LAWRENCE AQUILLA COLBY, IV**

shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a):

a. any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, or 2252A, 2252B, or 2260 or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, received or possessed in violation of Title 18, United States Code, Chapter 110;

b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

Property Subject to Forfeiture

4. The property to be forfeited includes, but is not limited to, the following:

- a. iPhone XR, Serial Number FK1XM3ZZKXL6
- b. Motorola XT1952DL, IMEI 359538091612313
- c. Motorola XT1955DL, IMEI 359529091103155
- d. Samsung Galaxy J3 Orbit, IMEI 352069106335325

Substitute Assets

5. If the property described above, as a result of any act or omission of the defendant:
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property that cannot be subdivided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C.

§ 853(p), as incorporated by 18 U.S.C. § 2253(b) and 28 U.S.C. § 2461(c).

18 U.S.C. § 2253

21 U.S.C. § 853(p)

28 U.S.C. § 2461(c)



Erik L. Barron
United States Attorney

SIGNATURE REDACTED

Foreperson

Date: June 21, 2022